

## Massaro, Luly (PUC)

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**From:** WilsonFrias, Cynthia (PUC)  
**Sent:** Wednesday, March 4, 2020 3:37 PM  
**To:** Massaro, Luly (PUC)  
**Subject:** FW: [EXTERNAL] : Comments on ASO Reporting

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Please put this with Jon Hagopian's comment on the same topic. Thanks

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**From:** Handy Seth <seth@handylawllc.com>  
**Sent:** Wednesday, March 4, 2020 3:08 PM  
**To:** WilsonFrias, Cynthia (PUC) <Cynthia.WilsonFrias@puc.ri.gov>  
**Subject:** [EXTERNAL] : Comments on ASO Reporting

Hi Cindy:

You have asked for comments on whether Narragansett Electric's reports on the ASO issue have been helpful and should be continued. You are well aware of our position on the ASO issue and process, which explains our lack of comment. However, if this ASO process is approved for RI and will go on, such reporting is certainly necessary to increase transparency. I'd submit that the reporting does not provide the level of transparency that developers deserve and need to develop their projects, but some transparency is clearly better than none at all. As it stands, it seems that Narragansett Electric simply reports out what it has decided to impose on the industry, like it or not. That's entirely inconsistent with federal policy/procedure (embodied principally in FERC Order 1000) which is to ensure that stakeholders have the opportunity/capacity to influence the system planning process and ensure that the utility transmission provider isn't "unduly discriminatory or preferential" in providing for its own needs and the needs of its native load customers rather than the integration of cost effective renewable energy. Ideally, there would be transparency and accountability around such important issues as i) compliance with federal planning and cost allocation policies (provided sufficiently in advance so that stakeholders can respond and potentially influence it) ; ii) system improvement planning process (distribution and transmission), iii) cost allocation (ie, a) as soon as they know what project caused the cost they should report it so that projects can assess economic impact and proceed with planning; b) distinguish jurisdictional from non-jurisdictional facilities re allocation of cost burden; c) where are we in considering/approving a new cost allocation formula, etc), etc.

The imposition of transmission system planning processes and costs on local distributed generation (if approved in RI) would be an entirely new chapter of utility planning and cost allocation policy/procedure, which would warrant a whole new level of transparency and stakeholder participation in New England Power's transmission system planning and cost allocation procedures. If the State of RI intends to take this on (instead of honoring existing federal policy on it), we'd recommend either following federal policy on it altogether (ie, doing what the federal government would have us do for it) or opening up a new docket so that stakeholders can help determine how it can and should be handled differently than federal policy (if at all).

Thank you for your consideration of our comments.

Best.

Seth

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